

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

ARTIS WHITEHEAD)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:24-CV-02991
)	JURY DEMAND
CITY OF MEMPHIS, JAMES HOWELL,)	
TERRY LYONS, ROBERT RAGLAND,)	
JOSEPH PEARLMAN, VIVIAN MURRAY,)	
THOMAS WARRICK, TIMOTHY GREEN,)	
EDWARD BASS, ROBERT HULL, JR.,)	
JAMES BOLDEN, and UNKNOWN)	
EMPLOYEES OF THE CITY OF MEMPHIS,)	
)	
Defendants.)	

**UNOPPOSED MOTION OF DEFENDANT CITY OF MEMPHIS FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant City of Memphis (“the City”), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.2, hereby respectfully moves the Court to extend the deadline for the City to respond to Plaintiff’s Complaint (ECF No. 1) through and including March 6, 2025. In support, the City states the following:

1. Plaintiff filed his Complaint on December 12, 2024.
2. The summons and Complaint were served on the City on or about January 17, 2025.
3. The Court granted the City’s first Motion for Extension to February 21, 2025, due to the City’s counsel needing additional time to adequately investigate Plaintiff’s causes of action against the City. (*See* ECF No. 23.)
4. Due to unforeseen developments, the City needs additional time to adequately

respond to the Complaint in this matter.

5. No party will be prejudiced by the relief requested herein as only three Defendants have been served in this matter, upon information and belief. (*See* ECF Nos. 18, 24, 25.)

6. This Motion is made in good faith and not for the purpose of delay.

7. Plaintiff does not oppose this Motion.

WHEREFORE, Defendant City of Memphis respectfully requests that its deadline to respond to Plaintiff's Complaint be extended through and including March 6, 2025.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Bruce McMullen

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Attorneys for Defendant City of Memphis

CERTIFICATE OF CONSULTATION

I, Bruce McMullen, hereby certify that counsel for the City contacted Plaintiff's counsel via email on February 21, 2025, regarding this Motion. On February 21, 2025, counsel for Plaintiff, Quinn Rallins, responded that Plaintiff does not oppose this Motion.

s/ Bruce McMullen
Bruce McMullen

CERTIFICATE OF SERVICE

I, Bruce McMullen, hereby certify that on February 21, 2025 I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing upon all counsel of record in this action.

s/ Bruce McMullen
Bruce McMullen